



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One St. Andrew's Plaza  
New York, New York 10007

July 5, 2022

**BY ECF**

The Honorable Denise L. Cote  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Saadah Masoud, 22 Cr. 359 (DLC)***

Dear Judge Cote:

The Government opposes the defendant's request to travel to West Miami, Florida to attend a wedding between July 7 and July 9, 2022. (Dkt. No. 11).


Following this morning's conference, the Government conferred with the Pretrial Services Officer charged with supervising the defendant, and learned that Pretrial Services also opposes the defendant's request to travel. According to Pretrial Services, out-of-district travel for social purposes is rarely approved for defendants subject to location monitoring. In particular here, in view of the other, strict conditions of the defendant's pretrial release, including home detention with permission to leave the residence only for verifiable employment and education purposes, as well as Court and medical purposes, Pretrial Services views the requested travel as inappropriate.

The Government agrees with Pretrial Services, and opposes the defendant's request. In view of the seriousness of the charges, the defendant's history of violent conduct, and the defendant's limited verified ties to the community, the Government respectfully submits that unnecessary travel for social purposes poses both a danger to the community and a risk of flight.

Respectfully submitted,

Lindsey Keenan  
United States Attorney

by:

  
Lindsey Keenan  
Assistant United States Attorney  
(212) 637-1565

*The request to travel is  
denied.*  
*Denise Cote*  
*7/5/22*